## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

SARAH MOLINA, et al.,	)		
Plaintiffs,	)		
, and the second	)	Case No.:	4:17-cv-2498 AGF
V.	)		
	)		
CITY OF ST. LOUIS, MISSOURI, et al.,	)		
70.0	)		
Defendants.	)		

## **DECLARATION OF SARAH MOLINA**

## I, Sarah Molina, declare as follows:

- 1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness. I am a plaintiff in the above-captioned action.
- 2. On November 30, 2014, I saw St. Louis Metropolitan Police Department officers threaten to use pepper spray against a person they perceived to be expressing an anti-law enforcement view in order to retaliate against him for that perceived view and chill him from publicly expressing it. The person threatened was unarmed, non-threatening, nonviolent, and not engaged in any crime.
- 3. On December 31, 2014, I saw SLMPD officers use pepper spray against several people who were unarmed, non-threatening, and nonviolent and were people SLMPD officers perceived to be expressing an anti-law enforcement view in order to retaliate against them for that perceived view and chill them from publicly expressing it.
- 4. Defendants' Exhibit M does depict the house I owned at 1221 N. Euclid, but it is not a fair and accurate view of the house from the intersection of Page and Euclid. The non-

zoomed, non-foreshortened photograph denominated as Plaintiffs' Exhibit 1 is a more accurate view. The house I owned, which is south of both the paved alley and Maple Avenue, is barely visible (depending on the foliage) from the Page and Euclid intersection.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 12th day of August, 2020

By: Jarch K Molina
Sarah Molina

